

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOHN ARDEN AHNEFELDT, ROBERT §
BROWER, JR., ROBERT BROWER, SR., §
KHANH L. BUI, JIGNESH §
CHANDARANA KRUITIKA §
CHANDARANA, AMIRA YOUSUF §
CHOWDHURY, CHRISTOPHER §
COLIGADO, DANIEL GAD, EDWIN §
HOWELL, SIOE LIE HOWELL, §
DARREN HUNTING, ANNE §
INGLEDEW, SHITAL MEHTA, §
THOMAS CARL RABIN, ADAM §
SHULTZ, AMIT SOMANI, §
JAYAPRAKASH SRINIVASAN, AARTHI §
SRINIVASAN, CHRISTOPHER §
SWEDLOW and ALEXANDRE TAZI, on §
Behalf of Themselves and All Others §
Similarly Situated, §

Plaintiffs, §

v. §

DAVID DICKSON, STUART A. SPENCE, §
And CHRISTOPHER A. KRUMMEL §

Defendants. §

Case No. 4:20-cv-02539

JOINT MOTION TO RESET INITIAL CONFERENCE

Plaintiffs¹ and Defendants David Dickson, Stuart Spence, and Christopher A. Krummel (“Defendants”) file this Joint Motion to Reset Initial Conference and would show the Court the following:

¹ “Plaintiffs” includes John Arden Ahnefeldt, Robert Brower, Jr., Robert Brower, Sr., Khanh L. Bui, Jignesh Chandarana Kruitika Chandarana, Amira Yousuf Chowdhury, Christopher Coligado, Daniel Gad, Edwin Howell, Sioe Lie Howell, Darren Hunting, Annie Ingledew, Shital Mehta, Thomas Carl Rabin, Adam Schultz, Amit Somani, Jayaprakash Srinivasan, Aarthi Srinivasan, Chistopher Swedlow, and Alexandre Tazi.

1. On July 17, 2020, Plaintiffs filed a Class Action Complaint against Defendants alleging violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934. Dkt. No.

1. This case is governed by the Private Securities Litigation Reform Act (“PSLRA”), which, among other things, establishes procedures for the appointment of a lead plaintiff. *See* 15 U.S.C. § 78u-4(a)(3).

2. On July 28, 2020, Nova Scotia Health Employees’ Pension Plan (“NSHEPP”), lead plaintiff in *Edwards v. McDermott Int’l, Inc.*, No. 4:18-cv-4330 (S.D. Tex.) (“*Edwards*”), pending before Judge George C. Hanks, Jr., filed a Notice of Related Case pursuant to Local Rule 5.2 in this action and submitting that the case be transferred to Judge Hanks. Dkt. No. 12. On the same day, NSHEPP filed a motion in *Edwards* to consolidate this case with and into *Edwards*. *Edwards* Dkt. Nos. 147-48. Plaintiffs filed their response to the Notice of Related Case, Dkt. No. 17, and opposition to the Motion to Consolidate. *Edwards* Dkt. No. 151. Defendants also opposed the Motion to Consolidate. *Edwards* Dkt. No. 152. Judge Hanks has not yet ruled on the Motion to Consolidate.

3. On September 16, 2020, Plaintiffs and four other applicants filed Lead Plaintiff Motions in this case under the PSLRA, 15 U.S.C. § 78u-4. *See* Dkt Nos. 19, 21, 23, 24, 25. The Lead Plaintiff Motions are now fully briefed. A decision on the Lead Plaintiff Motions is anticipated after Judge Hanks rules on the Motion to Consolidate. *See* 15 U.S. Code § 78u-4(a)(3)(B)(ii).

4. On January 4, 2021, Magistrate Judge Frances Stacy entered an order resetting the initial conference for January 14, 2021 at 10:00 AM.

5. In light of the pending and fully briefed Notice of Related Case, Motion to Consolidate, and motions to be appointed lead plaintiff, Plaintiffs and Defendants file this joint

motion to reset the initial conference until a time after the above-referenced Motion to Consolidate and Lead Plaintiff Motions have been decided. Once the Judge who will hear this case and the lead plaintiff have been determined, the Court and the parties will be able to have a more efficient and productive initial conference.

Agreed this 11th day of January, 2021.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of January, 2021, a true and correct copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Michael K. Oldham

Michael K. Oldham